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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Nicoleta Maria Tulai,

Plaintiff,

v.

Merrick Garland, Attorney General of the
United States of America; Alejandro
Mayorkas, Secretary of Department of
Homeland Security; Ur Jaddou, U.S.
Citizenship and Immigration Services;
Richard T. Murray, Field Office Director,
Reno Field Office U.S. Citizenship and
Immigration Services,

Defendants.

Case No. 3:23-cv-00351-LRH-CLB

**Stipulation and Order to Extend the
United States' Deadline to Answer or
otherwise respond to Plaintiff's Petition
for De Novo Review of Denial of N-400
Application for Naturalization [ECF
No. 1]**

(Fourth Request)

Plaintiff, Nicoleta Maria Tulai, through counsel, and the United States of America,
on behalf of Federal Defendants, through counsel, hereby agree and stipulate to extend the
deadline to answer or otherwise respond to Plaintiff's Petition for De Novo Review of
Denial of N-400 Application for Naturalization by an additional 30 days, until **May 3,**
2024. The parties enter into this stipulation based on the following:

1. Plaintiff filed her Petition on July 14, 2023 (ECF No. 1).
2. Plaintiff served the United States with a copy of the Summons and Petition
on November 6, 2023.

1 3. The original deadline for Federal Defendants to answer or otherwise respond
2 was January 2, 2024. The parties stipulated (ECF No. 7) and the Court granted (ECF No.
3 8) a 30-day extension to allow the parties to continue to work through this case in hopes of
4 resolving without the Court's intervention.

5 4. After an additional two stipulations and Court orders, the current deadline to
6 respond is April 3, 2024. *See* ECF No. 10–12.

7 4. Since the filing and serving of the Petition, and the granting of the previous
8 extensions, the parties have continued to engage in additional and productive discussions
9 that may resolve the issues in this case without the Court's intervention. The requested
10 additional 30-day extension will allow the parties, particularly Plaintiff's counsel additional
11 time to work with his client to decide on a plan of action moving forward. The additional
12 time will allow Plaintiff's counsel to communicate the plan to Defendants' counsel and
13 allow enough time to take appropriate action, including possibly filing a motion to dismiss.
14 Should the parties be able to resolve the matter without further litigation, a dismissal will
15 follow. Should the parties be unable to resolve the matter without Court intervention,
16 Federal Defendants will move forward with responding to Plaintiffs' Petition on or before
17 **May 3, 2024**. Accordingly, the parties believe good cause exists for the extension in the
18 interest of judicial economy and the parties' resources.

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1 Therefore, the United States requests that the Court extend the deadline for the
2 United States to answer or otherwise respond to **May 3, 2024**.

3 Respectfully submitted this 3rd day of April 2024.

4 JASON M. FRIERSON
5 United States Attorney

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11 *Attorney for Plaintiff*

12 /s/ Skyler H. Pearson
13 SKYLER H. PEARSON
14 Assistant United States Attorney

15 *Attorneys for the United States*

16 **ORDER**

17 No further extensions of time will be granted.
18 **IT IS SO ORDERED.**

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21 **UNITED STATES MAGISTRATE JUDGE**

22 **DATED:** April 4, 2024
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